

## Ashton Zylstra

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**From:** Cary Hansel  
**Sent:** Thursday, January 2, 2020 11:42 AM  
**To:** John Fredrickson -DGS-  
**Cc:** Ashton Zylstra; Robert McFarland -DGS-  
**Subject:** RE: Hulbert v Sgt. Pope, et al

Happy new year to you as well!

Please provide depo dates for any officers working with the Lt. Gov when the call was made.  
Thanks

----- Original message -----

From: John Fredrickson -DGS- <john.fredrickson@maryland.gov>  
Date: 1/2/20 11:36 AM (GMT-05:00)  
To: Cary Hansel <Cary@hansellaw.com>  
Subject: Re: Hulbert v Sgt. Pope, et al

Cary: Happy New Year. I trust you received my email notice that I was not in the office earlier this week. Looks like we will need Bob and Rob to participate in the discussion. I will contact them and get available times next week. Please let me know your availability as well. If we are not all available for a meeting, we should be able to arrange a conference call.

Although we have narrowed the field of MSP officers who were assigned to the Lt. Gov's detail in 2/18, none of them recall specifically working on 2/5/18 or contacting the Mansion about placing a MCP officer at Lawyers' Mall on that date. As we have discussed, the MSP retains its assignment schedules for 6 months.

Best,

John C. Fredrickson  
Assistant Attorney General  
Maryland Department of General Services  
300 W. Preston Street, Room 608  
Baltimore, Maryland 21201  
Telephone Number: (410) 767-1825

On Mon, Dec 30, 2019 at 2:23 PM Cary Hansel <Cary@hansellaw.com> wrote:

>  
> Gentlemen, this is at least my third request for a discovery meeting to address your continuing discovery failures.  
>  
> You provided no dates for a meeting in response to my other requests.  
>  
> Please respond with your availability this week and next.

>  
> Please also provide deposition dates for the two officers identified by Bitters and please identify the person who called Bitters as you have promised to do.  
>  
> Best regards,  
>  
> Cary  
>  
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>  
> ----- Original message -----  
> From: Cary Hansel <Cary@hansellaw.com>  
> Date: 12/24/19 6:09 PM (GMT-05:00)  
> To: John Fredrickson -DGS- <john.fredrickson@maryland.gov>  
> Cc: Robert McFarland -DGS- <robert.mcfarland@maryland.gov>  
> Subject: RE: Hulbert v Sgt. Pope, et al  
>  
> Please let me know when we can meet again prior to the filing of my motion.  
>  
> I propose the second week in Jan.  
>  
>  
> ----- Original message -----  
> From: John Fredrickson -DGS- <john.fredrickson@maryland.gov>  
> Date: 12/24/19 2:51 PM (GMT-05:00)  
> To: Cary Hansel <Cary@hansellaw.com>  
> Cc: Robert McFarland -DGS- <robert.mcfarland@maryland.gov>  
> Subject: Hulbert v Sgt. Pope, et al  
>  
> Cary: Please do not review and respond to this email before 12/26.  
> we will have plenty of time to discuss after the holiday.  
>  
> Pursuant to our discussions, I supplement Defendant Wilson's responses  
> to RFAs as follows:  
>  
> As to Jeff Hulbert RFAs:  
>  
> 5: Additional grounds: Not within scope of discovery in regards to  
> the remaining claims asserted against Defendant Wilson.  
>  
> 6: Additional grounds: Not within scope of discovery in regards to  
> the remaining claims asserted against Defendant Wilson.  
>  
> 7: no change  
>  
> 8: no change  
>  
> 10: Additional grounds: Not within scope of discovery in regards to  
> the remaining claims asserted against Defendant Wilson.  
>  
> 16: Additional grounds: Not within scope of discovery in regards to

- > the remaining claims asserted against Defendant Wilson.
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- > As to Kevin hulbert RFAs:
- >
- > Adds to Kevin:
- >
- > 9: Additional grounds: Not within scope of discovery in regards to
- > claims asserted against Defendant Wilson.
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- > 15: Additional grounds: Not within scope of discovery in regards to
- > claims asserted against Defendant Wilson.
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- > 16: Additional grounds: Not within scope of discovery in regards to
- > claims asserted against Defendant Wilson.
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- > 20: Additional grounds: Not within scope of discovery in regards to
- > claims asserted against Defendant Wilson.
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- > 22: Additional grounds: Not within scope of discovery in regards to
- > claims asserted against Defendant Wilson.
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- > John C. Fredrickson
- > Assistant Attorney General
- > Maryland Department of General Services
- > 300 W. Preston Street, Room 608
- > Baltimore, Maryland 21201
- > Telephone Number: (410) 767-1825